

WWW.MKCLAWGROUP.COM LAW OFFICES OF MICHAEL K. CHONG, LLC

NEW YORK: 1250 BROADWAY, 36TH FL. STE. 300 NEW YORK, NEW YORK 10001 (212) 726-1104 FAX (212) 726-3104

FORT LEE: 2 EXECUTIVE DRIVE, STE. 240 FORT LEE, NEW JERSEY 07024 (201) 947-5200 FAX (201) 708-6676

*PleaseReplyto:FORTLEE

HOBOKEN: 300 HUDSON STREET. STE. 10 HOBOKEN, NEW JERSEY 07024 (201) 708-6675 FAX (201) 708-6676

EMAIL: MKC@MKCLAWGROUP.COM

September 23, 2021

September 22, 2021

Via ECF; Total Pages: 1 Hon. Jesse M. Furman, U.S.D.J. United States District Court Southern District of New York 40 Foley Square New York, NY 10007

> Re: Doncouse v. Marine Layer et al Docket No. 1:21-cv-5664-JMF

Dear Judge Furman:

Application GRANTED. The conference currently scheduled for October 13, 2021, is hereby ADJOURNED to December **3, 2021**, at **4:00 p.m.** Pursuant to the Court's July 2, 2021 Order, the parties shall schedule a mediation to take place no later than two weeks before the conference (i.e., November 19, 2021, assuming no further modifications to the schedule). The Clerk of Court is directed to terminate ECF No. 17. SO ORDERED.

This office represents defendants, Marine Layer, Inc. and Grove TR LLC in the above referenced matter. Pursuant to Your Honor's Orders dated July 2, 2021 (Docs 5 & 6), the parties have been engaging in good faith settlement discussions, while at the same time seeking to schedule a Mediation session.

The parties jointly submit this letter to respectfully request an adjournment of the October 13, 2021 scheduled Initial Pretrial Conference to December 3, 2021, or a date thereafter that is most convenient for the court. Pursuant to the Court's Order dated July 2, 2021 (Doc 5), the mediation should take place at least two weeks prior to the Initial Pretrial Conference. If this request is granted, it would allow the parties to complete mediation on or before November 19, 2021.

The parties respectfully request the above adjournment to facilitate their direct good faith settlement discussions, costs savings for the parties, and effective use of the court's judicial resources.

Thank you for your kind consideration and courtesies in addressing this matter.

Respectfully submitted,

Michael K. Chong, Esq.

Michael K. Chong

MKC/

cc: All Counsel (Via ECF)